

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

IN RE iANTHUS CAPITAL HOLDINGS, INC. SECURITIES LITIGATION	No.: 1:20-cv-03135-LAK
THIS DOCUMENT RELATES TO:  No. 1:20-cv-03135-LAK (Jose Antonio Silva)	<b><u>NOTICE OF MOTION</u></b>

PLEASE TAKE NOTICE that, upon the accompanying joinder in Memorandum of Law in Support of Defendants iAnthus Capital Holdings, Inc.’s and Julius John Kalcevich’s Motion to Dismiss the Consolidated Amended Class Complaint, dated November 20, 2020,, and the other prior pleadings, proceedings and papers herein, the undersigned attorneys for Defendant Hadley C. Ford will move this Court, before the Honorable Lewis A. Kaplan, at the Daniel Patrick Moynihan United States Courthouse, Courtroom 21B, 500 Pearl Street, New York, New York, at a date and time determined by the Court, for an Order dismissing the Complaint with prejudice for failure to state a claim upon which relief can be granted under Federal Rules of Civil Procedure 12(b)(6), 9(b), and 8(a) and other further relief as the Court may deem just and proper.

As set forth in the Court’s Stipulation and Scheduling and Coordination Order dated October 14, 2020, Plaintiff shall file any opposition to this motion by January 8, 2021 and any reply shall be filed by Defendant by February 8, 2021.

DATED: New York, New York  
November 20, 2020

RESPECTFULLY SUBMITTED,

**PERKINS COIE LLP**

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